



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

Office of Chemical Safety  
and Pollution Prevention

December 12, 2013

Attn: Ms. Janelle Kay  
Pyxis Regulatory Consulting, Inc., Agent for  
Aldis Manufacturing, Ltd.  
4110 136<sup>th</sup> St., NW  
Gig Harbor, WA 98332


Dear Ms. Kay:

Pursuant to your data transfer request received October 31, 2013, we have approved the transfer of data ownership, of the attached data, from **Ritter Chemicals, LLC**, company number **9468**, to **Aldis Manufacturing, LTD**, company number **90437**. Effective as of the date of this letter, **Aldis Manufacturing, LTD**, company number **90437** will be considered the new data owner. We note that exclusive use was not transferred with this data. Please keep this letter in your records as the EPA does not track ownership of data in our database. This letter signifies the new ownership. This action will not automatically be reflected on the Data Submitters List. If you wish to be added to the Data Submitters List, you must submit an additional request to:

Document Processing Desk (DSL)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval, please call Louis Vaughn at (703) 308-8114.

Sincerely,

  
Steve Robbins, Chief  
Information Services Branch  
Information Technology and Resources  
Management Division. (7504P)

cc: Mr. James Wagner  
Wagner Regulatory Associates, Inc., Agent for  
Ritter Chemical, LLC  
P.O. Box 640  
Hockessin, DE 19707

RE: L\_9468\_DAT\_90437\_12\_12\_2013

### ATTACHMENT A

MRID	Study Name	Lab/Person Who Conducted Study	Date Study Submitted to EPA
46378201	Kull 41S: Product Properties B Group A.	Technology Sciences Group, Inc., and Frederick Institute of Plant Protection	10/5/04
46378301	Kull 50 S: Product Properties B Group A.	Frederick Institute of Plant Protection	10/5/04
46380401	Product Properties – Group A: Kull 62 MUP	Frederick Institute of Plant Protection	10/12/04
46400601	Product Properties Group A: Kull TGAI Glyphosate	Frederick Institute of Plant Protection	11/9/04
46494301	Product Properties – Group B: Kull 62 MUP	Technology Sciences Group, Inc.	3/14/05
46505901	Kull 41S [Basic Formulation] & Kull 41 [Alternative Formulation]: Product Properties – Group B.	Technology Sciences Group, Inc.	3/24/05
46506201	Kull 50 S [Basic Formulation] & Kull 50 [Alternate Formulation]: Product Properties – Group B	Technology Sciences Group, Inc.	3/24-05
46958601	Product properties – Group A & B: Alecto H2O Herbicide.	Technology Sciences Group, Inc.	10/17/06
47043601	Kull 41 S: Product Properties – Group A.	Technology Sciences Group	1/31/07
47657201	Clethodim 26.4% EC: Product Properties – Part A	Shenyang Research Institute of Chemical Industry	1/30/09
47657202	Clethodim 26.4% EC: Product Properties – Group B	Shenyang Research Institute of Chemical Industry; Technology Sciences Group, Inc.; Chilworth Technology, Inc.	1/30/09

<b>MRID</b>	<b>Study Name</b>	<b>Lab/Person Who Conducted Study</b>	<b>Date Study Submitted to EPA</b>
47856001	Discussion of the Impurities of Clethodim 24.6% EC.	Technology Sciences Group, Inc.	9/17/09
48061201	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Kull TGAI Glyphosate.	A Tillman, for Ritter Chemical, LLC	4/12/10
48061202	Preliminary Analysis: Technical Glyphosate: Final Report	Eurofins/Product Safety Laboratories	4/12/10
48061203	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the formation of Impurities, Certified Limits, and Enforcement Analytical Method for Kull TGAI Glyphosate	A Tillman, for Ritter Chemical, LLC	4/12/10
48061204	Purity Profile for 5 batches of Glyphosate Technical	Anadiag S. A.	4/12/10
48061205	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Kull TGAI Glyphosate.	A Tillman, for Ritter Chemical, LLC	4/12/10
48061206	5 Batch Analysis of Glyphosate Technical Material for Active Content, Relevant Impurities, Significant Impurities, Materials Insoluble in NaOH, & Water	Life Scientific Ltd., Sinochem Shanghai Corporation	4/12/10

MRID	Study Name	Lab/Person Who Conducted Study	Date Study Submitted to EPA
	Content		
48273801	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Ritter Clethodim MUP.	A Tillman for Ritter Chemical, Inc.	10/26/10
48273802	Physical and Chemical Characteristics of Clethodim 37% MUP: Color, Physical State, Odor, Stability, Oxidation / Reduction, flammability, pH, Viscosity and Relative Density.	Case Consulting laboratories, Inc.	10/26/10
48273803	Physical and Chemical Property Waiver Requests for Ritter Clethodim MUP.	A Tillman for Ritter Chemical, LLC	10/26/10
48739101	Physical and Chemical Characteristics of Clethodim 37% MUP: Storage Stability and Corrosion Characteristics: Final Report	Case Consulting Laboratories, Inc.	2/7/12
49190001	Physical and Chemical Characteristics of Clethodim 37% MUP: Storage Stability and Corrosion Characteristics: Amended Final Report	Case Consulting Laboratories, Inc.	8/2/13